

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

IN RE:

CHARLIE JONES
SSAN: XXX-XX-5113

WANDA JONES
SSAN: XXX-XX-3456

Debtor(s)

Case No. 16-31803-DHW
Chapter 13

TRUSTEE'S OBJECTION TO CONFIRMATION

COMES NOW, the Trustee, by and through the undersigned counsel, and pursuant to 11 U.S.C. §1325 objects to confirmation of the debtor(s)' plan as filed. As grounds for said objection, the Trustee states as follows:

1. The debtor(s) filed a petition seeking relief under Chapter 13 of the United States Bankruptcy Code on July 08, 2016.
 2. The debtor(s) §341 Meeting of Creditors was held August 25, 2016.
- (X) The debtor(s) was/were to amend Schedule I to list their current employer and income.
- (X) The following creditor was listed as unsecured, but filed their claim as secured or priority. The debtor's plan fails to make provisions for this claim:

Creditor: REPUBLIC FINANCE LLC
Trustee's Claim Number: 13
Account Number: 171612/NO PROV
Claim Amount: \$2,289.83
Court Claim Number: 6
Claim Filed As: SECURED

- (X) Debtors were to amend the plan to provide for a "pot" of \$5,000.00..
- (X) Debtors were to amend their schedules to disclose retirement accounts..
- (X) The debtors were to amend schedule I to reflect Mrs. income and employment with the Board of Education.

WHEREFORE, the above premises considered, Trustee objects to confirmation of the debtors' plan and requests that either confirmation be denied or the case be continued until such time as the above referenced issues have been resolved.

Respectfully submitted this October 05, 2016.

Office of the Chapter 13 Trustee
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Sabrina L. McKinney
Acting Chapter 13 Trustee

By: /s/ Tina J. Hayes

Tina J. Hayes

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have served copies of the foregoing Trustee's Objection to Confirmation on the parties listed below by either electronic mail or by placing same in the U.S. Mail, postage prepaid and properly addressed this October 05, 2016.

Copy to: DEBTOR(S)
RICHARD D SHINBAUM

/s/ Tina J. Hayes

Tina J. Hayes